

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ROWENA WARD individually, and on	§	
behalf of the Estate of RORY WARD	§	
JR., and RORY WARD SR,	§	
individually,	§	
<i>Plaintiffs,</i>	§	
V.	§	CIVIL ACTION NO. 4:23-cv-1708
	§	
HARRIS COUNTY, TEXAS, <i>et al.</i>	§	
<i>Defendant.</i>	§	

JOINT MOTION TO STAY

Harris County, James Fuller, Donna Reid (collectively, “Defendants”), and the Plaintiffs (collectively, “the Wards”), through their undersigned counsel, have conferred and jointly move the Court to stay discovery in this matter until resolution of the Defendants’ pending motions to dismiss. Doc. 58; Doc. 67; Doc. 68. There is good cause to grant this request because (1) two of the filings raise a good-faith basis for staying discovery until the dispositive motions are resolved; (2) multiple served defendants have not yet filed answers; and (3) the Wards are still attempting to serve other similarly-situated individual defendants. Therefore, the current discovery deadlines, including expert disclosures, should be temporarily stayed and rescheduled once the pending and potentially similar yet-to-be-filed motions are decided.

Date: November 14, 2024

Respectfully submitted,

SUSMAN GODFREY, L.L.P.

/s/ Jonathan J. Ross

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CERTIFICATE OF SERVICE

I certify that, pursuant to Federal Rules of Civil Procedure, a true copy of the instrument to which this Certificate is attached was duly served upon each party to this cause on the CM/ECF system, which will automatically serve a Notice of Electronic Filing to the parties.

/s/ Jonathan J. Ross

Jonathan J. Ross